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STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY  
3100 Port of Benton Blvd • Richland, WA 99352 • (509) 372-7950

December 18, 2007

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Ms. Shirley J. Olinger, Manager  
Office of River Protection  
United States Department of Energy  
P.O. Box 450, MSIN: H6-60  
Richland, Washington 99354

Mr. John C. Fulton, President  
CH2M HILL Hanford Group, Inc.  
P.O. Box 1500, MSIN: H6-08  
Richland, Washington 99352

Re: Ecology Review and Determination to the State Waste Discharge Permit ST 4511  
*Noncompliance Notification in the 241-C Tank Farm*

Reference: Letter from USDOE-ORP dated November 26, 2007, to Jane A. Hedges,  
Ecology, *Report of State Waste Discharge Permit ST 4511 Noncompliance*

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Dear Ms. Olinger and Mr. Fulton:

The Department of Ecology reviewed the referenced letter and report for the Permit noncompliance. This letter is transmitted in order to describe our assessment of your report and actions which you must undertake.

Based upon the information you submitted, Ecology determined that the reported water release was a permit violation of State Waste Discharge Permit 4511. Permit Condition S.4.A.1 states, "no discharge shall be allowed within a surface contaminated area." The Permit allows for two situations where a discharge may not result in a violation of this Permit Condition:

- "Incidental release" as described in Permit Condition S.7.D allowing discharges of up to 60 gallons under certain conditions. The release you reported was 240-250 gallons of raw water, clearly in excess of permissible incidental releases.
- "Upset conditions" as described in Permit Condition S.8 are exceptional incidents in which wastewater discharges that exceed permit limitations due to factors beyond the reasonable control of the Permittees. Ecology understands the cause of the water release to be sourced to operational error.



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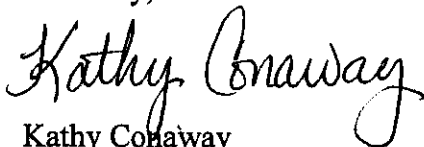
The Permittee is required to complete the following actions within 45 days of receipt of this letter:

- Develop or revise written water trailer operating procedures to prevent unplanned discharges in surface contamination areas.
- Ensure that water trailer equipment operations are supported by an operations checklist as enclosed within your noncompliance report and by pre-job briefings.
- Train water trailer operating personnel to the developed or revised operating procedures and initiate pre-job briefings which emphasize the consequences of unplanned discharges.

Ecology requires these measures of compliance to demonstrate future compliance with Permit Condition S.4.A.1. Noncompliance with the limits, monitoring requirements, terms, or permit conditions established in Permit ST-4511 may result in formal enforcement action or a permit modification by Ecology.

If there are any questions regarding this action, contact Kathy Conaway at 509-372-7890 or [kcon461@ecy.wa.gov](mailto:kcon461@ecy.wa.gov), or Rick Bond at 509-372-7885.

Sincerely,



Kathy Conaway  
Permit Manager  
Nuclear Waste Program

pll

cc: Dave Bartus, EPA  
Davis Zhen, EPA  
Mary Jarvis, USDOE  
Brad Erlandson BNI  
Moses Jaraysi., CH2M  
Chris Kemp, CH2M  
Phil Miller, CH2M  
John Bates, FH  
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Ken Niles, ODOE  
John Martell, WDOH  
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